

1 KEKER & VAN NEST LLP
2 ROBERT A. VAN NEST - # 84065
3 rvannest@kvn.com
4 CHRISTA M. ANDERSON - # 184325
canderson@kvn.com
5 DANIEL PURCELL - # 191424
dpurcell@kvn.com
6 633 Battery Street
San Francisco, CA 94111-1809
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

7 KING & SPALDING LLP
8 BRUCE W. BABER (pro hac vice)
bbaber@kslaw.com
9 1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Telephone: (404) 572-4600
10 Facsimile: (404) 572-5100

11 Attorneys for Defendant
GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,

Case No. 3:10-cv-03561 WHA

16 Plaintiffs,

**GOOGLE INC.'S ADMINISTRATIVE
MOTION TO SEAL EXHIBIT 4 TO
KARWANDE DECLARATION IN
SUPPORT OF GOOGLE'S OPPOSITION
TO ORACLE'S RULE 59 MOTION**

17 v.

18 GOOGLE INC.,

19 Defendant.

Dept. Courtroom 8, 19th Fl.
Judge: Hon. William Alsup

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Google Inc. (“Google”) hereby
2 moves to file under seal Exhibit 4 to the Declaration of Maya Karwande in support of Google’s
3 Opposition to Oracle’s Rule 59 Motion for a New Trial. Google seeks to file under seal the
4 portions of the response that summarize, quote from, or reproduce portions of materials that have
5 been designated by Oracle as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL –
6 ATTORNEY’S EYES ONLY” under the Protective Order. The portions of this response that
7 summarize, quote from, or reproduce portions of materials designated by Oracle as
8 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” are set
9 forth in the Declaration of Maya Karwande in Support of Google’s Administrative Motion to Seal
10 Exhibit 4 to Google’s Opposition to Oracle’s Rule 59 Motion. Google states no position on
11 whether disclosure of the information designated by Oracle would result in competitive harm to
12 Oracle.

13

14 Dated: July 20, 2016

KEKER & VAN NEST LLP

15

16

By: /s/ Robert A. Van Nest

ROBERT A. VAN NEST
CHRISTA M. ANDERSON
DANIEL PURCELL

17

Attorneys for Defendant
GOOGLE INC.

18

19

20

21

22

23

24

25

26

27

28